### IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

Clerk, U. S. District Court
Western District of Texas

By

Deputy

THE ESTATE OF DAMION MICHAEL SCHROEDER, by and through the personal representative Michael Schroeder and Sandra L. Keyser; and ANNE M. CLANCEY, as guardian of L.G.C., Heir of Damion Michael Schroeder, Plaintiffs,

-VS-

Case No. A-12-CA-1139-SS

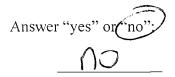
GILLESPIE COUNTY; GILLESPIE COUNTY SHERIFF'S DEPARTMENT; SHERIFF BUDDY MILLS; and UNNAMED DEPUTY SHERIFFS, Defendants.

#### **VERDICT FORM**

We, the jury, unanimously answer the following questions by a preponderance of the evidence:

#### **QUESTION ONE**

Do you find, from a preponderance of the evidence, Gillespie County violated Damion Michael Schroeder's constitutional rights to reasonable medical care and protection from harm while he was a pretrial detainee at Gillespie County Jail?



If you answered "yes," proceed to Question Two. If you answered "no," answer no further questions.

## **QUESTION TWO**

Do you find, from a preponderance of the evidence, that Gillespie County's 2009 Inmate Suicide Prevention & Watch Policy was the moving force in the death of Damion Michael Schroeder?

	Answer	"yes"	or	"no	":
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If you answered "yes," proceed to Question Three. If you answered "no," answer no further questions.

# **QUESTION THREE**

What damages, if any, proved by a preponderance of the evidence, did each of the plaintiffs sustain as a result of Gillespie County's violation of Damion Michael Schroeder's constitutional rights?

(a	ι)	Damion Michael Scl	hroeder's Estate
А	nsw	er in dollars and cents	, if any:
			reasonable and necessary expenses of hospitalization, medica and nursing care, and treatment
			reasonable funeral and burial expenses
(t	))	Michael Schroeder	
A	nsw	er in dollars and cents,	, if any:
			loss of companionship and society sustained in the past
			loss of companionship and society which in all probability will be sustained in the future
			mental pain and suffering in the past
			mental pain and suffering which in all probability will be sustained in the future

(	(c)	Lola Grace Clancey
A	Answe	r in dollars and cents, if any:
		pecuniary loss sustained in the past
		pecuniary loss which in all probability will be sustained in the future
		loss of companionship and society which in all probability wil be sustained in the future
Treached		are no further questions. Sign and date this form and inform the CSO you have ict.
S	Submi	tted the day of August 2014 at o'clock m.
		SIGNATURE REDACTED PURSUANT TO E-GOVERNMENT ACT OF 2002
		PRÉSIDING JUROR